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22 *Counsel for Defendant Google LLC*

23 UNITED STATES DISTRICT COURT

24 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

25 CHASOM BROWN, WILLIAM BYATT,
26 JEREMY DAVIS, CHRISTOPHER
27 CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of themselves and
all others similarly situated,

28 Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

29 **DECLARATION OF JONATHAN TSE IN
SUPPORT OF GOOGLE LLC'S
ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF THE MAY 3, 2022
HEARING TRANSCRIPT RE SPECIAL
MASTER OBJECTIONS (DKT. 627)**

Judge: Hon. Susan van Keulen, USMJ

1 I, Jonathan Tse, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney at Quinn Emanuel
3 Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I make
4 this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I
5 could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of Google’s
7 Administrative Motion to Seal Portions of the May 3, 2022 Hearing Transcript re: Special Master
8 Objections (Dkt. 627) (“Transcript”). In making this request, Google has carefully considered the
9 relevant legal standard and policy considerations outlined in Civil Local Rule 79-5. Google makes
10 this request with the good faith belief that the information sought to be sealed consists of Google’s
11 confidential and proprietary information and that public disclosure could cause competitive harm.

12 3. The information requested to be sealed contains Google’s confidential and
13 proprietary information regarding highly sensitive features of Google’s internal systems and
14 operations, including details related to Google’s internal projects, internal identifiers, data signals
15 and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as
16 confidential in the ordinary course of its business and is not generally known to the public or
17 Google’s competitors.

18 4. Such confidential and proprietary information reveals Google’s internal strategies,
19 system designs, and business practices for operating and maintaining many of its important services,
20 and falls within the protected scope of the Protective Order entered in this action. *See* Dkt. 61 at 2-
21 3.

22 5. Public disclosure of such confidential and proprietary information could affect
23 Google’s competitive standing as competitors may alter their identifier system designs and practices
24 relating to competing products. It may also place Google at an increased risk of cyber security
25 threats, as third parties may seek to use the information to compromise Google’s data sources,
26 including data logs, internal data structures and internal identifier systems.

27 6. For these reasons, Google respectfully requests that the Court order the Transcript to
28 be filed under seal.

1 I declare under penalty of perjury of the laws of the United States that the foregoing is true
2 and correct. Executed in San Francisco, California on July 25, 2022.
3

4 DATED: July 25, 2022

5 QUINN EMANUEL URQUHART &
6 SULLIVAN, LLP

7 By /s/ Jonathan Tse
8 Jonathan Tse
9 Attorney for Defendant

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